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SHIRLEY V. REMMERT, PRO SE
990 Berkeley Avenue
Menlo Park, CA 94025
Tel: 650-921-8820

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

Shirley V. Remmert,
Plaintiff,

v.

District Attorney
Of San Mateo County,
James P. Fox,
Defendant

PLAINTIFF'S EXHIBIT OF PROPOSED
PETITION FOR WRIT OF HABEAS
CORPUS BY EVA D. AL-ZAGHARI TO
BE CONSIDERED FOR HER JOINDER
AS PLAINTIFF AND OTHER
REQUESTED RELIEF

CASE NO. C-08-1645

DATE

TIME:

PLACE:

450 Golden Gate Avenue
Room

ORIGINAL
needs P/S for @

I, Plaintiff Shirley V. Remmert, hereby file an exhibit of Eva D. Al-Zaghari's
petition for writ of habeas corpus to be considered by this court for her joinder as a
plaintiff and for other requested relief stated in this matter.

I declare that the above statement is true and correct under the penalties for
perjury of the federal laws.

DATE: July 14, 2008

Shirley V. Remmert
Plaintiff

FILED
RECEIVED
03 JUL 14 PM 4:03
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
M

Habeas Corpus
Petition as
Exhibit

PETITION FOR A WRIT OF HABEAS CORPUS BY A PERSON IN STATE CUSTODY

Name AL-ZAGHARI EVA D
 (Last) (First) (Initial)

Prisoner Number Soc Security # ... 4763

Institutional Address _____

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

EVA D. AL-ZAGHARI)
 (Enter the full name of plaintiff in this action.))

vs.)

Case No. _____
 (To be provided by the clerk of court)

STATE OF CALIFORNIA)
PROBATE COURT)
DEPUTY PUBLIC GUARDIAN)
OF SAN MATEO COUNTY)
MARCELLE MOON)
 (Enter the full name of respondent(s) or jailor in this action)

**PETITION FOR A WRIT
 OF HABEAS CORPUS**

Read Comments Carefully Before Filling In

When and Where to File

You should file in the Northern District if you were convicted and sentenced in one of these counties: Alameda, Contra Costa, Del Norte, Humboldt, Lake, Marin, Mendocino, Monterey, Napa, San Benito, Santa Clara, Santa Cruz, San Francisco, San Mateo and Sonoma. You should also file in this district if you are challenging the manner in which your sentence is being executed, such as loss of good time credits, and you are confined in one of these counties. Habeas L.R. 2254-3(a).

If you are challenging your conviction or sentence and you were not convicted and sentenced in one of the above-named fifteen counties, your petition will likely be transferred to the United States District Court for the district in which the state court that convicted and sentenced you is located. If you are challenging the execution of your sentence and you are not in prison in one of these counties, your petition will likely be transferred to the district court for the district that includes the institution where you are confined. Habeas L.R. 2254-3(b).

Who to Name as Respondent

You must name the person in whose actual custody you are. This usually means the Warden or jailor. Do not name the State of California, a city, a county or the superior court of the county in which you are imprisoned or by whom you were convicted and sentenced. These are not proper respondents.

If you are not presently in custody pursuant to the state judgment against which you seek relief but may be subject to such custody in the future (e.g., detainees), you must name the person in whose custody you are now and the Attorney General of the state in which the judgment you seek to attack was entered.

A. INFORMATION ABOUT YOUR CONVICTION AND SENTENCE

1. What sentence are you challenging in this petition? CONSERVATORSHIP

(a) Name and location of court that imposed sentence (for example; Alameda County Superior Court, Oakland):

SAN MATEO COUNTY

REDWOOD CITY

Court

Location

(b) Case number, if known 108876 LPS - CUSTODY

(c) Date and terms of sentence BEGINNING MAR. 26, 2005

(d) Are you now in custody serving this term? (Custody means being in jail, on parole or probation, etc.) Yes ☒ No ☐

Where?

Name of Institution: _____

Address: _____

2. For what crime were you given this sentence? (If your petition challenges a sentence for more than one crime, list each crime separately using Penal Code numbers if known. If you are challenging more than one sentence, you should file a different petition for each sentence.)

GRAVE DISABILITY UNDER LPS ACT WELF + I
CODE SEC. 5000 et seq.

3. Did you have any of the following?

Arraignment: Yes _____ No _____

Preliminary Hearing: Yes _____ No ☒

Motion to Suppress: Yes _____ No _____

4. How did you plead? I OPPOSED JUDICIAL PROCESS

Guilty _____ Not Guilty _____ Nolo Contendere _____

Any other plea (specify) COURT HAD NO JURISDICTION

5. If you went to trial, what kind of trial did you have?

Jury ☒ Judge alone _____ Judge alone on a transcript _____

6. Did you testify at your trial? Yes _____ No ☒

7. Did you have an attorney at the following proceedings:

(a) Arraignment Yes _____ No _____

(b) Preliminary hearing Yes _____ No _____

(c) Time of plea Yes _____ No _____

(d) Trial Yes ☒ No _____

(e) Sentencing Yes _____ No _____

(f) Appeal Yes _____ No ☒

(g) Other post-conviction proceeding Yes ☒ No _____

8. Did you appeal your conviction? Yes ☒ No _____

(a) If you did, to what court(s) did you appeal?

Court of Appeal ^{"RECEIVED"} Yes _____ No _____

Year: 06 Result: NO RESPONSE

Supreme Court of California Yes _____ No ☒

Year: _____ Result: _____

Any other court Yes ☒ No _____

Year: _____ Result: _____

(b) If you appealed, were the grounds the same as those that you are raising in this

petition?

Yes ☒ No ☐

(c) Was there an opinion?

Yes ☐ No ☒

(d) Did you seek permission to file a late appeal under Rule 31(a)?

Yes ☐ No ☒

If you did, give the name of the court and the result:

9. Other than appeals, have you previously filed any petitions, applications or motions with respect to this conviction in any court, state or federal? Yes ☒ No ☐

[Note: If you previously filed a petition for a writ of habeas corpus in federal court that challenged the same conviction you are challenging now and if that petition was denied or dismissed with prejudice, you must first file a motion in the United States Court of Appeals for the Ninth Circuit for an order authorizing the district court to consider this petition. You may not file a second or subsequent federal habeas petition without first obtaining such an order from the Ninth Circuit. 28 U.S.C. §§ 2244(b).]

(a) If you sought relief in any proceeding other than an appeal, answer the following questions for each proceeding. Attach extra paper if you need more space.

I. Name of Court: SUPERIOR COURT

Type of Proceeding: HABEAS CORPUS

Grounds raised (Be brief but specific):

a. FALSE IMPRISONMENT, LACK of CAUSE

b. MENTAL & PHYSICAL ABUSE

c. COURT HAS NO JURISDICTION

d. _____

Result: DENIED Date of Result: _____

II. Name of Court: SUPREME COURT OF STATE of CA

Type of Proceeding: HABEAS CORPUS

Grounds raised (Be brief but specific):

a. FALSE IMPRISONMENT - LACK OF CAUSE

b. MENTAL & PHYSICAL ABUSE

c. COURT LACKS JURISDICTION

d. _____

Result: DENIED Date of Result: 9/27/2006

III. Name of Court: U.S. DISTRICT COURT

Type of Proceeding: HABEAS CORPUS

Grounds raised (Be brief but specific):

a. FALSE IMPRISONMENT - LACK OF CAUSE

b. MENTAL & PHYSICAL ABUSE

c. COURT LACKS JURISDICTION

d. _____

Result: NOT APPROVED FOR FILING Date of Result: 6/25/2007

IV. Name of Court: _____

Type of Proceeding: _____

Grounds raised (Be brief but specific):

a. _____

b. _____

c. _____

d. _____

Result: _____ Date of Result: _____

(b) Is any petition, appeal or other post-conviction proceeding now pending in any court?

Yes _____ No ☒

Name and location of court: _____

B. GROUNDS FOR RELIEF

State briefly every reason that you believe you are being confined unlawfully. Give facts to support each claim. For example, what legal right or privilege were you denied? What happened? Who made the error? Avoid legal arguments with numerous case citations. Attach extra paper if you

1 need more space. Answer the same questions for each claim.

2 [Note: You must present ALL your claims in your first federal habeas petition. Subsequent
3 petitions may be dismissed without review on the merits. 28 U.S.C. §§ 2244(b); McCleskey v. Zant,
4 499 U.S. 467, 111 S. Ct. 1454, 113 L. Ed. 2d 517 (1991).]

5 Claim One: see attached pages 62 & 64

6
7 Supporting Facts:

8
9
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11 Claim Two:

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13 Supporting Facts:

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15
16
17 Claim Three:

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19 Supporting Facts:

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21
22
23 If any of these grounds was not previously presented to any other court, state briefly which
24 grounds were not presented and why:

GROUNDS FOR RELIEF

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1. CLAIM ONE & SUPPORTING FACTS

Civil Rights Violated under Color of Law and Authority

June 20, 2003

I wrote to a county psychiatrist, Dr. Catherine Reed, M. D. and told her that I did not want to continue her services. I said that I would consult with a private doctor. I did not realize that she had already made a report to Adult Protective Services to have me declared as a dependent adult without a court order and to have my mother declared negligent, because I do not agree with her diagnosis. It became open season on my mother and me by county government employees.

August ~ October, 2003

Numerous county workers came regularly to my home unannounced to see if I was taking care of my diabetic problem. I tried to hide from them. They created much chaos for my mother, my grandmother, and me living in our home.

July 29; July 30, 2004

I have been routinely picked up, detained, and sent to hospitals without cause after suspicious, unidentifiable persons working for the county made false accusations to the police on the above dates. The hospital would find no cause or write a self-serving diagnosis, then quickly release me.

October 21, 2004

Deputy Public Guardian Susann Woods, the conservator of my grandmother against her will, often came to the house and made my grandmother and me upset. I

1 showed my defiance by breaking her glasses lying on a table.

2 Deputy Sheriff Deborah Bacan came to the house, asked where I was, learned that
3 the glasses were repaired, and left.
4

5 She became interested in me as a case and later tried to have my mother
6 criminally charged for wanting to stop Ms. Woods' forced removal of my grandmother
7 from our home.
8

9 November 6, 2004

10 I was again picked up by the police without cause after a county employee
11 followed me and made a false accusation to the police. I was drugged in the mental
12 hospital by Psychiatrist Flynn at San Mateo Medical Center for two weeks. Her records
13 about me were misleading or false.
14

15 Psychiatrist Flynn and her staff never told my mother when there would be a
16 hearing, if any, for the two-week detention
17

18 November 14, 2004

19 Psychiatrist Flynn had me put in the isolation room. My wrists and ankles were
20 restrained. She wrote that I "punched people several times." I do not recall the incident.
21 She did not make a police report required by the law.
22

23 November 17, 2004

24 Deputy Public Guardian Susann Woods, the conservator of my grandmother
25 spoke with Psychiatrist Flynn about my grandmother and me.
26

27 November 18, 2004
28

1 Psychiatrist Flynn wrote in her medical records: [But] "Eva does not fit the
2 criteria of a conservatorship. Apparently, Ms. Woods wanted me out of my home.

3
4 December 1, 2004

5 Deputy Susann Woods and the caregiver whom she assigned to my grandmother
6 (Vicky Gadin) continued to disturb the peace in our home. Ms. Woods lied to sheriff
7 deputies and said that my grandmother was suicidal. Ms. Gadin told my mother and
8 possibly others that I was going into her bedroom and "playing" with her purse and the
9 coins in her purse.
10

11 March 26; March 27, 2005

12 I was not committing a crime and behaving normally when deputy sheriff Sean
13 O'Donnell placed me under his personal custody on March 26, 2005. No police report
14 was timely made until over a year later, in time for my mother's trial.
15

16 The Sheriff deputies called paramedics to the scene, our home in Menlo Park.
17 Neither the Menlo Park Fire Department nor AMR paramedics found me to be detainable
18 under a Welf. And I. Code sec. 5150. The fire trucks came quietly, so there was no real
19 emergency.
20

21 The sheriff deputies misled me into believing I was under their custody, as they
22 ordered me to be taken to Kaiser Hospital by the paramedics.
23

24 Kaiser Hospital continued the charade of placing me in custody. To make me ill,
25 the staff gave me very little food and drink during a 38-hour period including the time
26 that I could have eaten at home but for the deputies' intrusion. The staff kept me awake
27
28

1 through 4:00 a.m. I became disoriented because of a diabetic response to their
2 maltreatment.

3 Then Psychologist Dr. Follin Key transferred me to the mental ward of San Mateo
4 Medical Center. I was taken by Priority One ambulance around 4:00 a.m.

5 I was met by Sheriff Deputy Deborah Bacan, who led me to the psychiatric
6 emergency ward. She said some hostile words to me.

7 County psychiatrist Dr. Mary Margaret Flynn, M.D. began drugging me around
8 7:00 or 8:00 a.m. I still had not slept. In diabetic terms, I was starving. That did not
9 matter to her. She described me in her records as psychotic.

10 April 1, 2005

11 At a hospital hearing to keep me for two more weeks, Psychiatrist Flynn
12 pretended to read from bogus "police reports". She said that they initiated my being held
13 in custody by her. A staff report falsely states that I lunged at her.

14 April 13, 2005

15 The county staff routinely harassed me because my mother was visiting me.

16 Psychiatrist Flynn again misled the court at my habeas-corpus hearing that police
17 reports brought me to her on March 26, 2005 as a "5150". She made other false and
18 misleading statements.

19 May 4, 2005

20 The above psychiatrist for the third time misled the court at another habeas-corpus
21 hearing and said that police reports triggered the March 26, 2005 detention. She again
22
23
24
25
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1 made other false and misleading statements.

2 June 11, 2005

3 I escaped from Cordilleras with my mother's help but was forced to return. This
4 incident and other dates through April 13, 2005 are the subject of my mother's petition
5 for writ of habeas corpus in the U. S. District Court (Case No. SM340531A; C-08-1645
6 CRB).
7

8 June 13, 2005

9 Because I escaped with my mother, Cordilleras now had the excuse to stop visits
10 with my mother. To punish me for escaping, the staff often refused to give me soap for
11 bathing from June to September. I became severely and chronically ill.
12

13 2. CLAIM TWO & SUPPORTING FACTS

14 First Amendment Right of Free Speech

15 I am routinely punished by my custodians when I try to go to court to petition for
16 my release. The method of punishment is to disable me through psychosis-inducing or
17 mind-altering drugs. Cordilleras, in 2006, for example, did not lawfully pass on my
18 habeas-corpus petition to a private defender.
19

20 Parties Who Made the Error/ Committed the Alleged Crime/ Tort

21 County psychiatrist Mary Margaret Flynn, M.D.

22 Staff members of San Mateo Medical Center

23 Sub-contracting psychiatrist Dr. G. Austin Conkey, M. D.

24 Staff members of Cordilleras Mental Health Center
25
26
27
28

1 Deputy Public Guardian Marcelle Moon

2
3 3. CLAIM THREE& SUPPORTING FACTS

4 First Amendment Right of Freedom to Associate

5 I am routinely punished for associating with my mother because she, like me,
6 opposes my being locked up without cause. Medical records stated at the outset of my
7 being locked up that the staff must discourage family visits and encourage compliance
8 with "meds". My mother and I would be harassed as she continued to visit me. Dr.
9 Conkey's treatment of me became so intolerable that I asked my mother to help me leave.
10 She and I were set up for a three-year restraining order, which a judge issued after my
11 mother helped me leave on June 10, 2005 and after Psychiatrist Conkey asked for the
12 order.
13
14

15 4, CLAIM FOUR & SUPPORTING FACTS

16
17 Fourteenth Amendment Right of Due Process

18 On April 1, 2005, Psychiatrist Flynn lied at the hospital hearing for a two-week
19 detention when she said that police reports brought me to her hospital. There were no
20 police reports and she pretended to read from reports. Neither my mother nor I received a
21 copy of those reports.
22

23 Beginning April 13, 2005, County Counsel Peter Finck, County Counsel Judith
24 Holiber, and my private defenders, Jeff Hayden and Anne Murphy, allowed the caption
25 on pleadings to read as "State of California v. Eva Al-Zaghari", as though this were a
26 criminal case. "LPS" was placed after my case number as an irrefutable fact without
27
28

1 notice or hearing for me to have the most severe constitutional infringement challenged.

2 The court records about my case are sealed to hide the judicial abuse and to
3 prevent discovery of the false medical records. It was not until 2007 that my mother was
4 allowed to read them for her defense in her criminal trial (subject of her habeas-corpus
5 petition in U.S. District Court, Case No. C-08-1645CRB)
6

7 The psychiatric staff at San Mateo Medical Center wrote that I was violent and
8 had assaulted person(s). Their statements were misleading and false. Suspiciously, they
9 did not duly report the matter to law enforcement or name the victim(s). Psychiatrist
10 Flynn used the staff's statements against me at my habeas-corpus hearings on April 13
11 and May 4, 2005.
12

13 On April 1, April 13, 2005 and on May 4, 2005, she lied at each successive
14 hearing at a hospital and for my petitions for writ of habeas corpus, when she said that
15 police reports initiated my custody.
16

17 Psychiatrist Flynn did not give my mother or me notice of a hearing on April 14,
18 2005 for a temporary conservatorship. My mother was always accessible to the hospital
19 staff because she was there every day visiting me and getting as much information as
20 possible. We received the order about two weeks after the hearing.
21

22 On May 12, 2005, Psychiatrist Flynn sent me to Cordilleras Mental Health Center
23 for intensive care before there was a trial ordering the intensive care. The trial on June 7,
24 2005 came after Psychiatrist Flynn had me intensively beaten up by mind-altering drugs
25 at Cordilleras. "Intensive care" may be code words to mean being given more of their
26 crippling drugs. On June 7, appearing gravely disabled and destroyed, I had to face a jury
27
28

1 and testify for my release.

2 Private Defenders Anne Murphy and Robert E. Daye ignored my mother's offer of
3 evidence that there was no cause for my being locked up.
4

5 Private Defender Neal Winchell, my attorney at my trial on June 7, 2005, was
6 only interested in having me locked up. He did not arrange for me to have a hearing on
7 evidence to determine if I qualify as a patient under the LPS Act.

8 Psychiatrists Flynn and Conkey routinely gave me an overdose of the psychosis-
9 inducing or mind-altering drugs just before my appearing in court. Often, I could barely
10 walk and was severely disoriented from pain.
11

12 The reports by Psychiatrist Beverly Cox, M.D. state that I am not a drug addict,
13 suicidal, etc.

14 At Cordilleras, I am expected to believe all of their false reports about me; that I
15 am a drug addict, suicidal, etc. I am forced to go to meetings to correct the supposed
16 problem.
17

18 I am forced to submit to monthly withdrawals of blood for testing.

19 5. CLAIM FIVE & SUPPORTING FACTS

20 Fourteenth Amendment - Equal Protection of the Laws

21 My treatment at Cordilleras under Psychiatrist Conkey was always worse than
22 other patients. They were allowed to have weekend passes to go home. They were given
23 more food than me. The facility's doors were never locked for anyone. They were free to
24 come and go. Only a select few were heavily medicated. I learned that patients
25 diagnosed and treated as I was are typically released after one year. But the psychiatrists
26
27
28

1 reinstated the LPS conservatorship year after year. I was confined to an area the size of a
 2 courtroom for two years and was not allowed to go outside. I could not escape on my
 3 own anyway because the staff made me chronically ill from drugs and side effects.
 4

5 Around January, 2007, the staff finally let me walk outside for a block. The effort
 6 to walk exhausted me. I sustained a blister on my foot.

7 6. CLAIM SIX & SUPPORTING FACTS

8 Protection of the U. S. Disability Act

9
 10 The county created the grave disability for its own benefit and then exploited the
 11 condition by making it hard for me to plead in court as a drugged person. The county
 12 took away my opportunity to make a living in violation of the Disability Act.
 13

14 7. CLAIM SEVEN & SUPPORTING FACTS

15 Personal Rights CC sec. 1706 Violated
 16 Through Defamation,
 17 Alleged Criminal Acts and Foul Play,
 18 Personal Threats against My Life,
 19 Assault and Battery

20 Since 1997, Adult Protective Services, which provides the investigative reports
 21 for the county initiating a conservatorship, branded me as a ward of the state. I was never
 22 conserved until 2005 and only through foul play on the part of Kaiser, county employees,
 23 and the county's subcontractors.
 24

25 In 2002, I was arrested for slapping a stewardess when I had a diabetic seizure. I
 26 was detained in a federal correctional facility without treatment for diagnosed diabetes
 27 (Case No. CR-02-265, U. S. District Court, Chicago, *U. S. v. Eva D. Al-Zaghari*). I am
 28

1 unable to vindicate myself as a non-terrorist because the county has locked me up since
2 2003. I was on probation for the misdemeanor for three years. Implicitly, I was
3 competent to serve probation while the county conserved me as incompetent.
4

5 I was routinely insulted by Psychiatrist Conkey and his staff; intentionally placed
6 in an environment that is demeaning for the staff and myself involved. I was physically
7 abused every day.
8

9 After my mother helped me escape on June 11, 2005, I was caught and returned to
10 Cordilleras. (My mother was put on trial and sentenced on January 17, 2007, the subject
11 of her habeas corpus petition, Case No. SM340531A, No. C-08-1645 CRB)
12

13 County Counsel Judith A. Holiber, I am informed, allegedly fixed or socially
14 interacted with the jury foreman in order to get a conviction against my mother. The
15 supervising psychiatrist, Dr. Eugene Lee, M. D. over Psychiatrist Conkey, lied on the
16 witness stand and stated that I am a felon.
17

18 I had to go to a Family Court hearing about visits with my son without having
19 bathed on September 13, 2005. I complained in writing about the fact that the staff would
20 not let me use the shower or have soap. Deputy Public Guardian Marcelle Moon opposed
21 visits by my mother and me with my son. The judge granted her request. I have not seen
22 my son, now eight years old since March, 2005. I have an unfriendly relationship with
23 Muslim former in-laws. The county is aware of my lawsuits since 1999 alleging that they
24 terrorized me and thereby extorted \$145,000.
25

26 County employees are now causing me to lose my home through their fraud and
27
28

1 that of other parties (Case No. 08-3063, U. S. Bankruptcy Court), because I cannot
2 represent myself.

3
4 My sister sees me once a year with decreasing visits. I have not seen my father
5 since Sheriff deputies made misleading statements about me in 2004 that my father
6 learned about in 2008; that I accused him of raping me. Psychiatrist Flynn wrote the same
7 false or drug-induced statement in her medical record in 2004. To set the matter straight.
8 I was not raped by my father. I was drugged and raped in May, 1990 by a man who
9 resembled my father, and who, incidentally, resembles Psychiatrist Conkey. My life has
10 not been my own since May of 1990. I am presently in acute danger because of my
11 attempting to bring out possible motives for attacks against my family and me.
12

13
14 My mother will testify that a "Conkey" testified at my trial but a different Conkey
15 is in attendance at Cordilleras. The latter "Conkey" is the one I had to deal with at
16 Cordilleras. My mother also observed him at court hearings. There was a third and
17 different "Conkey" at a hearing on June 30, 2005. None of the "Conkeys" were
18 witnessed by the same judge.
19

20 During a seven-day period in late March, 2007, staff members pricked my index
21 finger about twenty times per day until my mother complained to Sheriff Deputy Meyers.
22 Sheriff Deputy Bridget Hensley and County Counsel Judith Holiber wanted to
23 incriminate my mother for learning of the incident and complaining about it while she is
24 restrained from having direct or indirect contact with me. The reason for the staff's
25 hostility toward me was the fact that my mother continued to help me plead for my
26
27
28

1 release.

2 Psychiatrist Conkey, in retaliation for the Sheriff Meyers' intervention, relocated
3 me to a halfway house in a Daly City neighborhood controlled by a gang. The psych
4 monitors encouraged me to walk outside alone. All of the drugging done by the said
5 psychiatrists against me ceased. Male strangers were in the house. I burned my finger
6 while cooking, as the monitors were rushing me out of irritation that I would not go
7 outside when they told me to. My mother and I agreed that I should leave. She helped
8 me escape on April 25, 2007.
9
10

11 I escaped on my own on May 2, 2007. A Highway Patrol officer helped me
12 contact my mother and I went home briefly until I was caught by Deputy Public Guardian
13 Marcelle Moon and her sheriff deputies. My mother was arrested and jailed. The Public
14 Guardian drugged me and forced me to testify against my mother in late May, 2007. I
15 testified that the drugs caused painful side effects.
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1 List, by name and citation only, any cases that you think are close factually to yours so that they
 2 are an example of the error you believe occurred in your case. Do not discuss the holding or reasoning
 3 of these cases:

4 U.S. SUPREME COURT DECISION TO GRANT
 5 FILING OF HABEAS-CORPUS PETITIONS TO DETAINEE
 6 ACCUSED OF TERRORISM (JUNE, 2008)

7 Do you have an attorney for this petition? Yes _____ No ✓

8 If you do, give the name and address of your attorney:

9 _____
 10 WHEREFORE, petitioner prays that the Court grant petitioner relief to which s/he may be entitled in
 11 this proceeding. I verify under penalty of perjury that the foregoing is true and correct.

12
 13 Executed on July 13, 2008
 14 Date

Eva D. Al-Zaghari
 Signature of Petitioner

15
 16 1574

17 DECLARATION BY SHIRLEY V. REMMERT

18 I, Shirley V. Remmert, the mother of Petitioner Eva Al-Zaghari declare that I have
 19 signed this document on her behalf under Rule 2(e) Subd. (C). I declare that the above
 20 statement is true and correct under the penalties for perjury of the federal laws.
 21

22
 23 July 13, 2008 Shirley V. Remmert
 24 Date Shirley V. Remmert

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PROOF OF SERVICE

Certificate of Service

I hereby certify that I caused the within document(s):

PLAINTIFF EVA D. AL-ZAGHARI'S PETITION FOR A WRIT OF HABEAS CORPUS

U. S. District Court Case No.

to be served on the party(ies) in this action:

1. **California State Attorney General Jerry Brown, 1300 I - Street, Sacramento, CA 95814;**
2. **Hon. Robert D. Foiles,** 3. **Deputy County Counsel Peter Finck,**
4. **District Attorney James P. Fox, 400 County Center Redwood City, CA 94063;**
5. **Eva D. Al-Zaghari pending release from isolation**

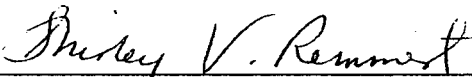
(By Personal Service) I, Shirley V. Remmert, caused each such envelope to be delivered by hand on **July 14, 2008** to the person or offices of each addressee indicated by the corresponding number (2, 3, 4).

(By First Class Mail) I, A. Garcia, caused each such envelope to be mailed on **July 14, 2008** in the U. S. Post Office to each addressee indicated by the corresponding number


(1). *I, Arturo Garcia, am a self-employed agent over 18 years of age and I am not a party in this case. My business address is 21 Coleman Place, Menlo Park, CA 94025.*

I declare that the above statements are true and correct under the penalties for perjury of the state of California.

Date: July 14, 2008


Shirley V. Remmert

Date: July 14, 2008


A. Garcia

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PROOF OF SERVICE

Certificate of Service

I hereby certify that I caused the within document(s):

**PLAINTIFF'S EXHIBIT OF PROPOSED PETITION FOR WRIT OF HABEAS
CORPUS BY EVA D. AL-ZAGHARI TO BE CONSIDERED FOR HER JOINDER
AS PLAINTIFF AND OTHER REQUESTED RELIEF**

U. S. District Court Case No. **C-08-1645 CRB**

to be served on the party(ies) in this action:

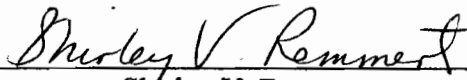
1. **California State Attorney General Jerry Brown, 1300 I - Street, Sacramento, CA 95814;**
2. **Hon. Robert D. Foiles,** 3. **Deputy County Counsel Peter Finck,**
4. **District Attorney James P. Fox, 400 County Center Redwood City, CA 94063;**
5. **Eva D. Al-Zaghari pending release from isolation**

(By Personal Service) I, Shirley V. Remmert, caused each such envelope to be delivered by hand on **July 14, 2008** to the person or offices of each addressee indicated by the corresponding number (2, 3, 4).

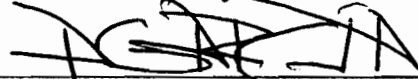
(By First Class Mail) I, A. Garcia, caused each such envelope to be mailed on **July 14, 2008** in the U. S. Post Office to each addressee indicated by the corresponding number (1). *I, Arturo Garcia, am a self-employed agent over 18 years of age and I am not a party in this case. My business address is 21 Coleman Place, Menlo Park, CA 94025.*

I declare that the above statements are true and correct under the penalties for perjury of the state of California.

Date: July 14, 2008


Shirley V. Remmert

Date: July 14, 2008


A. Garcia